

## Own Initiative Report on Cultural and creative sectors in the age of AI (2025/2180(INI)) – additional written submission by the EWC

- related to the Stakeholder Meeting on Monday, 2<sup>nd</sup> of March 2026-

To the attention of

- Zoltán TARR, MEP, Rapporteur for the own initiative Report 2025/2180(INI);
- Shadow-Rapporteurs for the own initiative report 2025/2180(INI);
- CULT-Secretariat.

*Brussels, 27<sup>th</sup> February 2026*

**Dear Rapporteur Zoltán Tarr, dear Co-Rapporteurs,  
dear Members of the Culture and Education (CULT) Committee:**

The European Writers' Council (EWC) expresses its gratitude for the invitation to give both oral and written feedback prior to the Own Initiative Report on Cultural and Creative Sectors in the Age of AI (2025/2180(INI)), and for inviting us to outline the most important points on behalf of Europe's 1.2 million book authors at the meeting on 2<sup>nd</sup> of March.

**We consider your approach to be one of the most important, decisive even, measures of this legislative period, as we are standing at the crossroads between two eras:** the Enlightenment and recognition of human creativity, with its principles: the freedom of art and its protection; the diversity of languages, expressions and identity; human-powered-innovation – and, on the other hand, the outsourcing of art, creativity, decision-making abilities and communication to machines.

### **Pre-amble: The EWC, and its experience with positions on so-called “AI”**

As the only federation worldwide representing the interests of authors of the book sector, the European Writers' Council (EWC) is a non-profit, non-governmental federation constituted by 52 writers' and literary translators' associations in 34 European countries, from the EU, the EEA countries Iceland and Norway, as well as Belarus, Switzerland, Montenegro, North Macedonia, and the UK. EWC members comprise over 250,000 professional authors in the book sector, writing in 37 languages and publishing in all genres (fiction, non-fiction, educational, academical, children & young adult, poetry).

The EWC conducts data queries, monitoring and surveys among its members, such as on contracts and fees; social and working conditions; creative, cultural and educational perspectives; income, social, pension and tax conditions; moral, economic, and authors' rights' perspectives; and, frequently since 2018, the impact of emerging technologies including so-called “Artificial Intelligence” (an over-interpreted term without concrete meaning).

We advocate on behalf of all the 1.2 million book writers active in the European sector, who publish 500,000 new titles annually, which contribute to an annual turnover of 24.9 billion euros (2024-2025), and, as such, are part of a core foundation of the CCS as Europe's third largest economy. **At the same time, although writers are the irreplaceable sources of both financial value creation and likewise ethical, moral, cultural, and European civil societal values, and the first in the chains of public welfare through their works and sales, they are the last to be considered by both legislation and the social economy.** The writer is first – but remunerated and protected last.

This applies in particular to the severe, and in some cases irreversible, impact of so-called “AI” by its developers and users. Our attempts to achieve greater transparency; fairer compensation for severe remuneration losses; and an EU-wide agreement to recognise that various AI products are based on the non-consensual exploitation of our works and labour have been fruitless. We consider the means by which the major AI products have been created to be an attack not only against us, but against the European mutual understanding of the significance of human cultural production and human cultural reception. With this in mind, we kindly ask you to take our submission into consideration.

## Six key aspects to be considered within the Report by the Rapporteurs and the CULT Committee:

### 1. Assessment of the market harm of generative and manipulative “AI” on human works and their authors

Although our member organisations monitor job and income losses as well as book market damage arising from competing AI products (texts, translations, illustrations), **we call for the INI-report to initiate a comprehensive and EU-wide study on market harm done under the headings of:**

- Input: licensing revenue and investment loss through non-authorized use of millions of works, related to writers – the book sector – and state subsidies;
- Output: income declining, both through job loss, and by the AI-driven marginalisation of professional writers and translators’ skills, as they are more and more forced into using generative or manipulative AI, e.g. post-editing, reproducing visual AI outputs, or following an ChatGPT-made “exposé” for a novel or other text, and being demoted to mere “maintenance staff” for technologies of poor quality, but especially for significantly reduced fees; subsequent loss due to emerging “AI features” within cultural works, using books and other art without licensing, in case of derivatives, again competing with human authors;
- Overall: impact on collateral consequences, including on states and European societies, e.g. reduced tax payments, a decline of payments into pension schemes or social insurance systems and further societal and culture-economic aspects.

**A comprehensive study could give an overview on the extent of the harm done and therefore serve as a basis for the common reflection on future EU legislative intervention.** It would close an important gap – because most decision-makers only see unproven promises made by so-called ‘AI’ and ignore the actual, devastating effects on authors as the source of Europe's third-strongest economic sector – and the resulting state budgets.

Consequently, we ask the Members of the European Parliament to advocate for the necessity of such a comprehensive study towards the European Commission and the Member States.

#### -Background information on this demand-

At the very foundation of human culture and the value chains – both under terms of ethical principles and financial profit – is the writer and their creative works. **Never paid for their thousands of labour hours crafting a manuscript over years and upon private financial investment and rigorous self-exploitation, writers are, paradoxically, often economically marginalised. A book does not write itself; in a salaried working environment, an author would comfortably earn a minimum of around 60,000 euros in twelve months for an average of 1,000 to 1,700 working hours.**

**In the book sector, however, this upfront investment by the writer is neither acknowledged, nor, when it comes to the use of European works in mostly non-European AI companies, even counted as a loss—but the fact is that AI developers are not only plundering the work itself, but also the effort that went into creating it.** This includes the self-exploitation by the writer, the investments made by publishers, but also by the states themselves when they launch programmes to promote literature, such as scholarships or residencies, tax breaks for writers, or prizes and other cultural promotion measures. AI developers invest in none of this and profit from the production *and* the final work.

There are currently over 1,000 large language models in use worldwide, dozens of which have a computing capacity of  $23^{10}$  FLOP and a database of several million protected text works, often books published well before 2021 and the entry into force of the CDSM Directive 2019/790 (EU). These generative models (re)produce text and simulate “machine translation”.

European writers and translators of the book sector are among the most ripped-off independent cultural workers by mostly non-European technology companies, which have developed highly profitable programmes based on our works, of the labour and of capital behind every book.

The EWC analysis of 2023<sup>1</sup> already showed, how the promised success of “AI” is built on exploitation of labour hours, investment, context, and how the output and books-imitating products harm remuneration, reputation, and reinforces bias, language discrimination, and leads to heavy de-skilling. **Over the past three years, translators in the five larger markets saw a decline of commissions by a third, illustrators by a fourth. Authors are competing with AI-outputs on their market and have a loss of licensing revenues in the billions,** while AI-products simulating books enjoy privileges meant for human creation: CMO revenues, prizes, scholarships, and other benefits meant for cultural assets created by human originality.

#### Selected examples:

**(a) (a) Uncontrolled AI output is being pushed into the bestseller lists with click farms:** For years, the global provider Amazon has been flooded with thousands bogus books by fake authors whose text products have been produced by generative software. AI bots from click farms “read” these book-imitating works, articulate random machine-made reviews, and push them into the bestseller lists<sup>2</sup>. This led to a rapid decline in revenue for human authors by shared-revenue models, such as Kindle KDP (a pool of revenue divided by pages read and number of authors, similar to Spotify). At peak times, 80 out of 100 Kindle KDP bestsellers are AI editions. **Amazon refuses to label AI output.**

**(b) Identity theft and name deception:** The world's most important review platform Goodreads, like Amazon, is flooded with AI books published under the illegitimately used names of real human authors (or slightly altered spellings of known writers). These books are listed as new releases in the authors' profiles and entice readers to buy them. The income from these AI books flows to unknown sources. Human authors who are cheated out of their earnings must spend money to defend themselves with lawyers. So far, neither Goodreads nor Amazon have stopped this identity theft.

**(c) Unauthorised machine translations open up foreign-language markets** and channel sales to unknown sources: We observed cases of books being illegally translated from, for example, the English language into Spanish and Portuguese by means of robot translation without a licence, and published under a different name, usually in Amazon Selfpublishing. The revenues flow to unknown sources.

**(d) Illegal remuneration claims to collective management organisations and state funding programmes:** It cannot be ruled out that automatically generated and machine translated press articles and machine translated books, or even regenerative produced AI images, already “enjoy” private copying levies from collective managements organisations (CMOs), as there is no real labelling obligation yet. Likewise, scholarships, prizes or State’s grants are–unintentionally–provided towards AI products instead incentivising human works.

#### **(e) Amazon is using AI for non-licensed derivatives of books or enhanced AI-features**

The “Recaps” (“Story So Far”) feature summarises prior books in a series. How Amazon approached acquiring rights to copy and ingest full books in order to create AI-generated summaries, has not until now, been answered by the non-European monopoly. Kindle Translate is an AI-based translation, launched 6/11/25, offering machine translation from English and Spanish, and from German to English. This will impact translators’ job massively. The feature Ask this Book is, since 11/12/25, available for “thousands of English-language books” on the Kindle iOS app in the U.S. and lets readers ask questions about the e-books they are reading. Requests on licensing for this feature and any protections involved (whether to prevent against hallucinations, or to protect the text from further AI training), are still not answered by the tech giant; who seem also to ignore the requirement for a proper TDM opt-out.

<sup>1</sup> <https://europeanwriterscouncil.eu/gai-is-based-on-theft/>

<sup>2</sup> <https://www.vice.com/en/article/v7b774/ai-generated-books-of-nonsense-are-all-over-amazons-bestseller-lists>

## 2. Develop checks and balance on the professional and social situation of authors and cultural workers regarding the pressure coming from AI products – including through funded projects by the EU and misuse of cultural asset-privileges by AI outputs

AI and its destructive impact on culture and its sources, the authors, should be an important aspect within the follow-up of the High-Level-Round Table and the Commission's plan on this issue, including regarding the planned "European LLM", and the "AI Apply Strategy".

- **We urge the Committee to call on the European Commission to ensure that human creativity is put front and centre in the upcoming AI strategy for the CCS, as well as any upcoming action under the Culture Compass.** This should entail including CCS stakeholders being active participants in AI governance, especially in relation to policies directly affecting them.

**Public funding, also within European programmes, likewise need human-centred governance regarding AI.** Human-made works of writers and translators should still be priority in public funding safeguarding diversity, social responsibility, and human creativity as keystones of society.

- **We call upon the Members of Parliament to advocate for the establishment of rules to avoid the funding of non-human works made by AI-based products, as we see a need for public funding to be channelled exclusively towards human-made works in the book, text, and cultural sector.** Any funding programme proposed by the EU Commission should always be turned to human works and creativity. Sustaining and promoting AI throughout EU funding is harming the sector and authors. For example, ARTE is encouraging the development of AI within the EU Commission funding programme, therefore endangering at its core human works and creativity.

Member States enjoy a certain national flexibility in fostering and promoting their creative sectors and promoting cultural assets; for example, by reduced VAT, by the fixed book price, by a basic income for artists (Ireland), or by social insurance systems where the state pays an additional contribution to the payments to authors. **As AI-products, especially when unlabelled as such, commit fraud and misuse privileges meant to foster human works and the humans behind every work, the EWC calls upon the Committee and the Member of Parliament, to encourage Member States to set up binding rules against this fraud.** Calls for tenders or commissions, or the funding of festivals, prizes or similar subsidies, should be subject to clear conditions to promote human made work, including the obligation towards large media online retailers or content providers, to label AI output and to avoid consumer betrayal.

- **We encourage the report drafters to call upon Member States to set up clear rules for eligibility for public funding – especially in regard to respect an authors' wish to say "no" to the use of their works within TDM, GPAL, or generative AI usage.**
- National and European funding programmes to promote any generative AI use within the book sector, replacing human work and originality, shall be rejected or, as a basic safeguard, respect the EWC ART-principle of **Authorisation, Remuneration, and Transparency**

## 3. Bring diversity and discoverability back to European cultural works.

As recognised by texts such as the European Charter for Regional or Minority Languages and the Universal Declaration for Linguistic Rights, Europe's linguistic diversity is not only a core part of its cultural heritage, but also an essential pillar of democracy, pluralism and social cohesion.

**However, the fast expansion of generative AI poses significant risks to this European diversity.**

We kindly request to the Members of this Committee, to continue pursuing the excellent intentions expressed within the European Parliament resolution of 14 September 2023 and on the Future of the European book sector (2023/2053(INI)), describing the essential role of books in our societies as "*an*

*invaluable source of knowledge, education, culture, information and entertainment and a vital means of preserving and disseminating the EU's values, cultural and linguistic diversity and cultural heritage."*

The further this aim, the EWC proposes the following measures to prevent the homogenisation of European linguistic and cultural diversity in the literary and cultural fields, and to re-establish discoverability:

- **Stimulating the creation or consolidation of funding programmes** for creative and for professional writing in Europe, especially **for works written in medium-sized and small or lesser-published languages.**
- Stimulating the creation or consolidation of **funding programmes for literary translation among Europe's diverse languages, particularly medium-sized and small or lesser-spoken ones**, to maintain the current quality standards and to foster dialogue between different literary and linguistic systems on equal terms and with all the necessary linguistic and cultural nuances.
- **Promoting exchange and intercultural dialogue programmes** among the different literary systems of the European Union, involving not only authors and translators but also publishers and booksellers as agents in the book value chain, but **foremost the federations and associations as key hubs for capacity building.**
- **A legislative work on active anti-discrimination of the discoverability of European cultural works, like the AVMS Directive.** With the Audiovisual Media Services (AVMS) Directive (amended in 2018, implemented in 2022) new obligations to promote European cultural works for on-demand services, the European decisionmakers made a decisive move to foster European values of unity in diversity. For example, on-demand media service providers in a national jurisdiction must offer at least a 30% share of European works in their catalogues and ensure the prominence of those works.

The EWC calls on the CULT committee to develop in its report a similar legislative instrument, to foster the cultural ambitions of EU Member States, to protect the diversity and to enhance the discoverability of European cultural works in all fields, where AI-driven agents, systems and algorithms pre-dominantly override linguistic and cultural plurality and suppresses European works and languages.

#### **-Background information on these demands-**

**a) Generative AI systems, and especially LLMs, are mainly trained on material belonging to the dominant languages, making these languages far more effective and with a stronger digital presence than less-used languages.** This creates disadvantages for speakers of smaller European languages, who may find AI tools less functional in their own tongues. Over time, this imbalance could encourage a shift toward dominant and non-European languages in publishing, education, business and online communication, threatening both cultural diversity and the linguistic rights of minoritised communities in Europe.

**b) Generative AI also accelerates cultural homogenisation in general.** In the creative and literary fields, AI software often optimises for mainstream, market-tested narrative patterns, reinforcing dominant cultural models and marginalising local and unconventional voices. If widely adopted in text generation, «translation» or «editing», AI could standardise language use and pressure more unconventional authors to conform to dominant norms set by machines, undermining not only linguistic diversity but also the cultural expressions embedded within it. Generative AI, and its pre-censored vocabulary, coded within non-European oligopolies, do not equitably represent local expressions, terms, idioms and variety of opinions—especially in multilingual, culturally diverse markets.

**c) The massive use of AI for “translating” texts will imply damages to cultural diversity and a remarkable linguistic impoverishment, since machine “translation” often prioritises semantic**

**equivalence over cultural nuance.** Idioms, oral traditions and culturally specific references risk being simplified or neutralised, potentially leading to a gradual erosion of Europe's rich plurality of voices, principles, identities and visions. Plus, as translators will be replaced, the de-skilling and involution of cultural techniques multiply.

**d) AI-driven algorithms decide what cultural works are promoted and purchased. Today, cultural works find consumers, rather than the other way around:** Algorithm-driven feeds, recommendation engines, and AI-powered personalisation have fundamentally disrupted how people engage with culture and make purchasing decisions.

As a result, decision-making code by non-European entities define European spaces of "Economy of Attention", e.g. which kinds of cultural works are over-presented, and which are reaching Dante's loop of invisibility. Readers or consumers of books, of music, or film cease to actively search to discover art, and instead now passively view a customised proposal created by machine – **to the detriment of niche topics and avant-garde, subversive or non-mainstream cultural works, and to the disadvantage of local retailers and the whole European sector.**

#### 4. Trust and Transparency as key principles

**AI and its current usage affect public trust in democratic societies, including trust in news, media, and the provenance of creative and cultural works, including texts and books.** When AI-generated output circulates without clear disclosure or labelling, it becomes difficult for people, consumers and readers to distinguish between human-created works and machine-generated products. Thus, they cannot make informative decisions if to believe or to purchase, or are being manipulated into false premises, or suffer on non-corrected pseudo-facts. This could potentially weaken confidence and trust in cultural creation.

**The EWC appeals to the CULT committee and to the Rapporteurs of the INI report, to put a trustworthy AI with full transparency obligation into its core.** The people of Europe deserve to know what they read, listen to, believe, or purchase. Also, non-European online platforms need to be obliged to label AI outputs as such with a fine-granular approach, e.g. like a Nutri-Score, and what kind of technology was used (or not), including generative, assistive, decisional algorithm, etc.

**Regulations on compliance and transparency in public broadcasting, tele-media providers and the cultural sector regarding provenance, responsibility, authorship and respect for the rights of third parties have been implemented and applied throughout the cultural and media sector. There is no reason why the same rules should not apply, in particular, to the use and distribution of AI-driven applications, especially when they imitate literature, culture, news or media.**

The CULT committee ought to have in mind the European Parliament resolution of 14 September 2023 on the Future of the European Book Sector (2023/2053(INI)) (Rapporteur Tomasz Frankowski), emphasising the essential role of books in our societies, and "*the importance of transparency related to AI training, including data collections and their sources*". Hence, **transparency obligations**, such as the envisaged in the context of the *Digital Fairness Act*, mostly aimed to prevent unfair or manipulative digital practices, which would also be the case in the cultural and media sphere, **are not only technical requirements, but essential instruments for protecting democratic values, cultural integrity and fair cultural market conditions in the age of AI.** As the EWC has been claiming in the consultation of the Code of Practice on marking and labelling of AI-generated content, full transparency regarding AI-generated products is essential.

**We call upon the CULT to draw up an ambitious report, and to put transparency in its centre:**

- **Labelling should be mandatory and continuous across the entire cultural value chain**, operating at every stage: within an AI model; during inference and re-prompting; file conversions; and downstream distribution. This persistent marking chain must start with the

model and continue through the user to the recipient, to build an unbroken provenance history and prevent the removal or the degradation of labels.

- In order to achieve that persistence, **labelling should be multi-layered and fine-granulated**. We advocate for a multi-approach system, which combines marking, watermarking, detection and provenance certificates, since there is no single technique that works for all formats. Here, we are concerned about the primacy of watermarking as the main option of this Art. 50-Code, since it is easily erasable. **Provenance labelling will be especially needed to verify press and media works, to enhance trust in media, and the fourth power of democracies.**
- **Another combination we stand for is that both human-readable labels and machine-readable marking are necessary**, in the sense that marking and labelling should be useful for diverse profiles of stakeholders and the different degrees of transparency they need. For example: authors and rightsholders need to prove the human origin of their works for licensing and remuneration; platforms offering books need metadata for correct payments and categorisations; readers also need this kind of information in order to decide which cultural goods they want; Collective Management Organisations (CMOs) require such labels to license and remunerate properly the authors; and states will want to avoid granting awards, cultural subsidies and tax privileges to AI-generated products.
- **It is imperative to introduce obligations on digital platforms to accurately label AI-generated outputs as such**, beyond what is established by the AI Act's obligations, which only apply to AI system providers and deployers. This could also be promoted by a Guideline.

## 5. Freedom of art begins with the freedom to choose one's work equipment

Transparency is also needed regarding the production and commercialisation process of books and texts and within the sector. With the EWC "AI Toolkit for the Book sector"<sup>3</sup> (2024), we have drawn up necessary, sector-specific codes of conduct to be settled in mutual understanding of a shared responsibility among authors, publishers, retailers and further institutions, like libraries, reviewers, but also agents or the reader themselves. This includes transparent communication and respecting the moral rights of authors to the integrity of their work. **Contractual counterparts, for instance, should seek author's approval before using generative AI in relation to their works (for cover art, audio books, or for translations), and respect their rejection.** The same goes for libraries, to not feed digitised works into unsecured GPTs to get a summary, feeding unintentionally an LLM overseas.

**The goal should be to establish a mutual understanding on the utilisation of different kinds of AI, such as, but not limited to, synthetic voices in audio books, machine translation, generative cover illustration, and any other adaptation of the work by generative AI.**

Unfortunately, we have found that the understanding of a common approach is not based on reciprocity. We are receiving reports of instances where the author is forced to accept AI-adaptations. For example, publishers are increasingly using AI-generated covers and when the authors request human visual artists, the authors are required to pay for this. Authors, as traditionally weaker contractual partners also due to the lack of enforcement instruments by law, hardly have the alternatives to refuse this. **Authors are pressured into accepting a technology that harms their own profession at its core.** Authors should have the right to choose to use human work in relation to their book, and refuse AI generated adaptations, without being disadvantaged and without negative consequences, such as lower royalties. **Therefore, we see a great need of better and more transparent contractual practices.**

- We ask the Rapporteurs and Shadow-rapporteurs, to emphasise as a general principle, to respect the writers' own choice of working methods, and to develop legislative instruments, e.g. mediation entities, to support writers when they reject the usage of AI.

<sup>3</sup> <https://europeanwriterscouncil.eu/ai-tool-kit2024/>

Particularly in the rapidly developing AI era, in which our works are being used or adapted en masse and without consent both within and outside the sector, it would be of utmost importance for Members of Parliament to initiate an adjustment of **EU competition law beyond the scope of the report. Authors' associations must be allowed to publicly advise** and provide information on contracts, clauses, fees, or even on how to deal with unauthorised AI use or AI adaptation.

## 6. Stop the rapid rise of de-skilling – in culture, education, and for the next generation of authors

According to Open AI's [own study](#)<sup>4</sup>, 800 million people (predominantly young users between the age of 18 and 25) submit 18 billion queries worldwide every week to the error-prone, pre-censored and resource-consuming communication-simulators. People no longer write or read themselves either but have teaching materials and books summarised by AI. [University lecturers in Europe and across the Atlantic](#)<sup>5</sup> are increasingly encountering **the phenomenon of young people who are not used to reading and who find it mentally, emotionally and physically exhausting to read texts longer than a chat**. The cultural techniques of “reading” and “writing” are not particularly high on the agenda in European national curricula; and Europe still suffers under the consequences of a decades-long education crisis. **As is so often the case, “AI” only acts as a catalyst for emerging disasters and is a magnifying mirror of existing desolate conditions. Including the rapid de-skilling:** The substitutive effect of generative and manipulative AI software is leading to a loss of skills that not only threatens writers, but society at large, with consequences for the youngest generation, for education and for all values we see in cultural diversity – but also onto the freedom to form an own opinion.

**As European competitiveness** is often more on the agenda than solutions to the educational crisis, we emphasise **that the importance of reading skills is also highlighted in the Draghi report as well**. Indeed, a deeper understanding of texts is vital for lifelong learning or quick adaption to the various changes in the job market. To protect the future of these skills, **and to avoid intergenerational inequity**, the EWC endorses a 2023 call of the EP on the Commission and Member States to develop:

- “Job creation action plans and sector-specific financial support and measures to ensure access to adequate social protection for those affected by digitalisation and AI-related job losses”.
- The EWC asks that the CULT Committee to reiterate these calls within its own-initiative report and demand the Commission to put forward decisive measures to remedy the impact of AI on cultural metiers and skills.**

### Final remarks

In a rapidly changing world where European values, as diversity of culture, are under pressure, for example by non-European AI-Tech or autocracy-driven book bans, carried out under the usage of AI recommendations, the European Union needs a distinctive, dedicated, and committed own-initiative report to strengthen European cultural sources, the authors and artists, as the most needed pillars upholding European values and cultural diversity.

The writers of Europe set their hopes on the CULT Committee to draft an ambitious report that stands firmly with Europe’s writers’ community in addressing the challenges imposed by advanced technologies based on our works and labour. We stay available and are eager to support the Rapporteur and Co-Rapporteurs in their tasks to the best of our ability.

With our kindest regards:

**Nicole Pfister Fetz**  
Secretary General

**Nina George**  
Commissioner for Political Affairs

**Sebastià Portell Clar**  
President

**Monika Pfundmeier**  
Vice President

<sup>4</sup> <https://cdn.openai.com/pdf/a253471f-8260-40c6-a2cc-aa93fe9f142e/economic-research-chatgpt-usage-paper.pdf>

<sup>5</sup> <https://www.theatlantic.com/magazine/archive/2024/11/the-elite-college-students-who-cant-read-books/679945/>